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Attorneys for: Defendant ROME
RESEARCH CORPORATION

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

RYANJAY T. DELA CRUZ)	CIVIL ACTION NO. CV08-0020
)	
Plaintiff,)	
)	
)	DEFENDANT'S CASE
vs.)	MANAGEMENT CONFERENCE
)	STATEMENT
)	
ROME RESEARCH CORPORATION,)	
)	
Defendant.)	Judge: Honorable Alex R. Munson
)	Date: April 29, 2008
)	Time: 9:00 a.m.

Pursuant to Local Rule 16.2CJ(e)(2)1, Defendant ROME RESEARCH CORPORATION
("Defendant") hereby submits its Case Management Conference Statement. The Case Management

Conference is scheduled for April 29, 2008 at 9:00 a.m.

(a) Service of Process: Defendant has been properly served. There are currently no additional parties to be served.

(b) Jurisdiction and Venue: Jurisdiction in this Court is proper under 28 U.S.C. § 1332(a)(1).

© Track Assignment: Defendant agrees with the Court's recommendation that this case be assigned the Standard Track.

(d) Anticipated Motions: Defendant anticipates filing dispositive motions in this case.

(e) Anticipated Discovery: Defendant may serve written discovery requests on plaintiff subsequent to the Case Management Conference. Defendant anticipates deposing plaintiff and other witnesses named by plaintiff.

(f) Further Proceedings: Defendant is agreeable to a trial date on March 17, 2009. Discovery cut off would be no later than sixty days before trial, and a pre-trial conference would be conducted two weeks before trial. Additional suggested dates are set forth in subsection (k) below.

(g) Special Procedures: Defendant is unaware of any special procedures that need to be implemented.

(h) Modification of Pretrial Procedures: Defendant submits that modification of the standard pre-trial procedures is not warranted in this case.

(I) Settlement Prospects: At this early stage of the litigation and prior to discovery, Defendant is unable to speculate on any settlement prospects.


(j) Other Matters: Defendant respectfully states that there are no other matters.

(k). Setting of Dates:

- (1) Joinder of parties: July 31, 2008
- (2) Motions to amend: July 31, 2008
- (3) Discovery cut-off: November 14, 2008
- (4) Status conference: December 16, 2008
- (5) Discovery motion hearing date: January 06, 2009
- (6) Dispositive motion cut-off: December 18, 2008
- (7) Dispositive motion hearing date: January 22, 2009
- (8) Settlement conference: February 05, 2009
- (9) Joint pre-trial order: March 3, 2009
- (10) Final pre-trial order: March 3, 2009
- (11) Trial: March 17, 2009

Dated this 23rd day of April, 2008.

Respectfully Submitted By:



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MEGUMI SAKAE
Attorneys for Defendant
Rome Research Corporation